

EXHIBIT C

Akin Gump

STRAUSS HAUER & FELD LLP

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February 7, 2019

Robert Kelner, Esq.
Covington & Burling LLP
850 10th Street NW
Washington, DC 20001

Re: Bijan Rafiekian's Document Request

Dear Mr. Kelner,

As you may know, we have joined Bob Trout and Gloria Solomon in the representation of Bijan Rafiekian in his criminal case currently awaiting trial in the U.S. District Court for the Eastern District of Virginia. We understand that you have provided legal representation to Flynn Intel Group, Inc. ("FIG") – a Delaware corporation of which our client was a director, officer, and principal shareholder – and that you continue to represent Michael Flynn. We also understand that a lawyer named Kristen Verderame may also have given legal advice to FIG. We have attempted to contact Ms. Verderame, but she responded that she is too busy to speak with us and referred us to you.

According to open-source records, FIG was organized on June 12, 2015, and the company's articles of incorporation were filed with the Delaware Secretary of State on June 17, 2015. The corporation's by-laws indicate that Mr. Flynn, Mr. Rafiekian, and a third individual named Philip Oakley constituted the board of directors at some time in the corporation's life. In the same bylaws, Mr. Rafiekian was initially named Chairman of the Board, President, and Secretary of the corporation. Mr. Rafiekian was also a principal shareholder of FIG, owning some 300,000 shares of the company's common stock.

On April 10, 2018, a certificate of dissolution, evidently signed by Michael Flynn, was filed on behalf of FIG with the Delaware Secretary of State. In that certificate, Mr. Flynn attested that (a) dissolution of the corporation was authorized on March 25, 2018, (b) the dissolution was authorized by the board of directors and shareholders in accordance with the Delaware General Corporation Law, and (c) the only directors of FIG were Mr. Flynn and Mr. Rafiekian.

At various times before and after dissolution of FIG, you have made representations to third parties – and have given direction to at least one other lawyer previously engaged to



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represent FIG – with regard to the corporation’s attorney client privilege and rights under the attorney work product doctrine.

Given this background, Mr. Rafiekian asks that you provide us with copies of the following:

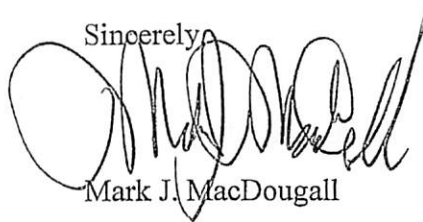
1. The board of directors’ resolution, meeting minutes, or unanimous written consent authorizing the dissolution of FIG on March 25, 2018, as attested in the certificate of dissolution filed by Michael T. Flynn.
2. Any board of directors’ resolution, meeting minutes, or unanimous written consent that resulted in the election Michael Flynn (and any other person) to serve as an officer, director, or both of FIG.
3. The shareholders’ resolution, meeting minutes, or unanimous written consent of the shareholders of FIG affirming dissolution of the corporation as attested in the certification of dissolution filed by Mr. Flynn.
4. Any and all engagement letters executed on behalf of FIG with your law firm.
5. Any board resolution, consent, or other writing that authorizes or otherwise permits the waiver by FIG of the corporate attorney-client privilege or attorney work product doctrine on behalf of the corporation by your law firm.
6. Any board resolution, consent, or other writing that authorizes or otherwise permits your law firm to inform Robert N. Kelley – or any other lawyer who provided legal advice to FIG – of the purported waiver of the attorney-client privilege or attorney work product doctrine by FIG. While we understand that disclosure to the government of the October 27, 2017 Declaration signed by Mr. Kelley was approved by Mr. Trout on behalf of Mr. Rafiekian, we want to understand whether any formal action was taken and when such formal action or decision was taken on behalf of the corporation.
7. The identity of the lawyer or lawyers who prepared and filed the corporate dissolution certificate that was signed by Mr. Flynn on March 25, 2018, and filed with the Delaware Secretary of State on April 10, 2018.

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Please call if you have any questions relating to this request. Thanks for your cooperation.

Sincerely,

A handwritten signature in black ink, appearing to read "Mark J. MacDougall", written over the word "Sincerely,".

Mark J. MacDougall

cc: Stacey Mitchell, Esq.
Robert Trout, Esq.